

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

JEFFREY F. and DONNA LAWRENCE *

Plaintiffs *

v. *

THE “IMAGINE...!” YACHT, LLC, et al *

Defendants *

CIVIL ACTION

NO. RDB-02-CV-3224

* * * * *

THE “IMAGINE...!” YACHT, LLC, et al *

Third-Party Plaintiffs *

v. *

SHER & BLACKWELL, LLP *

Third-Party Defendant *

* * * * *

**PLAINTIFF’S MOTION FOR LEAVE TO FILE SURREPLY TO DEFENDANT’S
OPPOSITION TO MOTION FOR SUMMARY JUDGMENT**

COMES NOW, the Plaintiffs, Jeffrey F. and Donna Lawrence, by and through their counsel Murray I. Resnick, Prabir Chakrabarty and Resnick & Abraham, L.L.C., and hereby requests leave to file a Surreply In Support of its Opposition to Defendant, Latitude 38 LLC D/B/A Annapolis Bay Charters’ (hereinafter referred to as “Annapolis Bay Charters”) Motion for Summary Judgment, and as reasons therefore, state as follows:

In Defendant Annapolis Bay Charter’s Reply, they mischaracterize Plaintiff’s arguments with respect to the control they exercised over the schooner “IMAGINE”. Defendant also raises

inaccurate arguments, with respect to the case law presented by Plaintiff. This court should allow Plaintiffs to file a surreply to clarify the record and respond to such arguments.

_____/s/_____
Prabir Chakrabarty
Murray I. Resnick
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of April 2004, a copy of the foregoing Request for Leave to File Surreply to Reply to Opposition to Motion for Summary Judgment, was served via e-filing and/or mailed, first class, postage prepaid to David W. Skeen, Esquire, Wright, Constable & Skeen, L.L.P., One Charles Center, 16th Floor, 100 N. Charles Street, Baltimore, Maryland 21201-3812, Attorneys for Defendant and Third-Party Plaintiff.

_____/s/_____
Prabir Chakrabarty